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Attorneys for Defendant,
THE PERMANENTE MEDICAL GROUP, INC.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

JULIE AMORUSO,

Plaintiff,

v.

THE PERMANENTE MEDICAL GROUP, a
California corporation; and KAISER
FOUNDATION HOSPITALS, a California
corporation, collectively dba KAISER
PERMANENTE SOUTH SACRAMENTO
MEDICAL CENTER, KAISER PERMANENTE
ROSEVILLE MEDICAL CENTER and
KAISER PERMANENTE STOCKTON
FACILITY,

Defendants.

Case No. 2:20-CV-01335-KJM-DB

**JOINT STIPULATION AND REQUEST
FOR CONTINUANCE FOR PARTIES TO
COMPLETE ADR AND ORDER**

Complaint Filed: July 6, 2020
Trial Date: TBD

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1 Counsel for Plaintiff JULIE AMORUSO (“Plaintiff”) and Defendant THE
2 PERMANENTE MEDICAL GROUP, INC. (“Defendant”), (collectively referred to as the
3 “Parties”), hereby enter into the following Joint Stipulation and request the Court to extend
4 certain pretrial deadlines, pursuant to applicable Local Rules. These are the only two Parties to
5 this Action.

6 1. This is an Action for alleged violation of Title VII of the Civil Rights Act of 1964
7 and the California Fair Employment and Housing Act, for Failure or Refusal to Hire on Basis of
8 Religion; Failure to Provide Religious Accommodation; and Disparate Impact on the Basis of
9 Religion. The Parties have engaged in extensive written discovery and completed several
10 depositions. After the conclusion of recent depositions, the Parties have agreed to engage in ADR
11 in a good faith effort to resolve this matter. The Parties postponed remaining depositions
12 scheduled for this week and jointly request a stay of the current deadlines. No trial date has been
13 set at this time. Furthermore, one witness remains unavailable for deposition due to an ongoing
14 leave issue. The Parties are meeting and conferring further today and tomorrow to select a
15 mediator and mediation date.

16 2. The Court has previously granted continuances in this matter to allow the Parties
17 to complete discovery. As the Parties now wish to engage in ADR, good cause exists for a
18 further continuance to allow for the ADR process, and to allow the remaining witness to return
19 from leave and appear for deposition if necessary. Because no trial date has been set in this
20 matter, the Parties agree no prejudice will be suffered by the Parties and the Court’s docket will
21 not be adversely impacted by granting this request.

22 3. The Parties hereby jointly request the Court to grant the Parties further time to engage in
23 mediation, prior to the completion of discovery, by moving the current deadlines by 120 days.
24 More specifically, the Parties request the following pretrial deadlines to be continued as follows:

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<u>CATEGORY</u>	<u>PRIOR DEADLINE</u>	<u>NEW DEADLINE</u>
Fact Discovery Cut-Off	July 28, 2022	November 25, 2022
Rebuttal Expert Witness Exchange	August 22, 2022	December 20, 2022
Expert Discovery Cut-Off	September 22, 2022	January 20, 2023
Dispositive Motions	October 31, 2022	February 28, 2023

4. The Parties agree to submit a joint report to the Court within 10 business days of the conclusion of the mediation to apprise the Court of the results and to propose deadlines for any necessary remaining events.

It is so AGREED.

Date: July 26, 2022

PACIFIC JUSTICE INSTITUTE

By: /s/ Kevin T. Snider (Auth. 07/26/2022)

KEVIN T. SNIDER
MATTHEW B. MCREYNOLDS

Attorneys for Plaintiff
JULIE AMORUSO

Date: July 26, 2022

JACKSON LEWIS P.C.

By: /s/ Michael J. Christian (Auth. 07/26/2022)

MICHAEL J. CHRISTIAN
SHANE R. LARSEN

Attorneys for Defendant
THE PERMANENTE MEDICAL GROUP,
INC.

ORDER

The Court, having considered the foregoing Joint Stipulation of the Parties, and good cause appearing therefor, makes the following order:

IT IS ORDERED THAT THE PRETRIAL DEADLINES ARE CONTINUED AS FOLLOWS TO ALLOW THE PARTIES TO ENAGE IN MEDIATION:

<u>CATEGORY</u>	<u>PRIOR DEADLINE</u>	<u>NEW DEADLINE</u>
Fact Discovery Cut-Off	July 28, 2022	November 25, 2022
Rebuttal Expert Witness Exchange	August 22, 2022	December 20, 2022
Expert Discovery Cut-Off	September 22, 2022	January 20, 2022
Dispositive Motions	October 31, 2022	March 10, 2023

The Parties are ordered to submit a joint report to the Court within ten business days after the completion of mediation, updating the Court of the results of the mediation and to propose deadlines for any necessary remaining events:

IT IS SO ORDERED.

DATED: August 2, 2022.


CHIEF UNITED STATES DISTRICT JUDGE